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February 6, 2006
Via ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: **Phone1, Inc.**
Docket 06-36
EB-06-TC-060 – Certification of CPNI Filing - (02/06/06)

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 30, 2006, Phone1, Inc. hereby files a copy of its 2006 Annual Compliance Certification of CPNI as required by section 64.2009(e) of the Commission's rules. As directed by the Public Notice, please include this in Docket 06-36.

Any questions you may have regarding this filing may be directed to me at 407-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes
Consultant to Phone1, Inc.

cc: Mr. Byron McCoy, byron.mccoy@fcc.gov
Best Copy and Printing, Inc., fcc@bcpiweb.com

**ANNUAL OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
COMPLIANCE**

I, Dilowe Barker, Chief Operating Officer of Phone1, Inc. certify and state that:

1. I have personal knowledge of the Phone1, Inc. operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Phone1, Inc.'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Communication's rules found in 47 CFR, Subpart U.
3. A further statement outlining the operating procedures and compliance of Phone1, Inc. is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)



Dilowe Barker, Chief Operating Officer
Phone1, Inc.

2/6/06 (Date)

Attachment A
Statement of CPNI Procedures and Compliance
Phone1, Inc.

Statement of CPNI Procedures and Compliance

Phone1, Inc. ("Phone1") operates primarily as an operator service provider and as such provides operator assisted call completion services to transient users of pay telephone and hospitality telephones. Such services consist of casual traffic provided outside of any subscribed service relationship and the company does not obtain any CPNI. The only information the company has is the raw call record containing the call-from number, the call-to number, the bill-to number, and the duration of the call. The company does not have any information about the individual calling or called party. Calls are billed by the local exchange carrier or via credit card.

Phone1 does not have any CPNI for its operator services operations, it therefore cannot use or permit access to CPNI. Moreover, Phone1 does not market its operator services to end users in any fashion. Its marketing efforts are directed towards aggregators and such efforts do not include the use of CPNI. Requests for raw call records by law enforcement agencies are only granted if a subpoena is provided.

Phone1 recently has expanded its business to include the provision of prepaid long distance services. The company does not use or permit access to CPNI to market any telecommunications or non-telecommunications services and has trained its personnel not to use CPNI for marketing purposes. Should Phone1 elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed. Phone1 has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission. Phone1 maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.